

EXHIBIT A

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

-----X
CAITLIN GELLES,

Index No.:

SUMMONS WITH NOTICE

Plaintiff,

-against -

VENUE

New York County

**SINTECMEDIA, NYC, INC. d/b/a OPERATIVE,
LORNE BROWN, LANCE RONCALLI,
JASON WITT, AMOTZ YARDEN, and
ADORAM YARDEN,**

BASIS OF VENUE

Defendant's Place of
Business

Defendants.
-----X

TO THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiff's attorney, at the address stated below, a notice of appearance or demand for a complaint.

If this Summons with Notice was personally served upon you in the State of New York, the notice of appearance or demand for complaint must be served within twenty (20) days after such service of the Summons with Notice, excluding the date of the service. If this Summons with Notice was not personally delivered to you within the State of New York, the notice of appearance or demand for complaint must be served within thirty (30) days after service of this Summons with Notice is completed as provided by law.

PLEASE TAKE NOTICE THAT the nature of this action is employment discrimination on the basis of Plaintiff's gender, caregiver status, disability and/or perceived disability, pregnancy discrimination, breastfeeding discrimination, and retaliation; in violation of Title VII of the Civil Rights Act of 1964, as amended; the Pregnancy Discrimination Act, New York State Human Rights Law; New York City Human Rights Law and the Americans with Disabilities Act; as well as unequal pay in violation of the Fair Labor Standards Act ("FLSA") 29 U.S.C. §§ 201 et seq., as

amended to include the Equal Pay Act, 29 U.S.C. §§ 206(d) et seq., the Pennsylvania Equal Pay Law, the New York State Equal Pay Act and the New York Labor Law.

The relief sought is: an amount to be determined at trial but in no event less than Two Million Five Hundred Thousand Dollars (\$2,500,000.00) together with attorneys' fees and interest thereon.

PLEASE TAKE FURTHER NOTICE that if you do not serve a notice of appearance or demand for a complaint within the applicable time limitation stated above, a judgment will be entered against you, by default, for the sum of Two Million Five Hundred Thousand Dollars (\$2,500,000.00) together with interest, attorneys' fees and the costs and disbursements of this action.

The action will be heard in the Supreme Court of the State of New York, in and for the County of New York. The basis for the venue is Defendant's place of business.

**Dated: New York, New York
September 28, 2021**

GODDARD LAW PLLC
Attorneys for Plaintiff

By: /s/ Megan S. Goddard
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New York, New York 10006
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TO: SINTECMEDIA, NYC, INC. d/b/a OPERATIVE
530 5th Avenue
New York, New York 10036

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